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**THE SCALI LAW FIRM**

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Attorney for Defendants,

**MAVERICK AUTO GROUP 2, LLC,  
dba VOLKSWAGEN OF FAIRFIELD  
and RAHIM HASSANALLY**

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

VOLKSWAGEN OF AMERICA, INC.,

Plaintiff,

v.

MAVERICK AUTO GROUP 2, LLC,  
dba VOLKSWAGEN OF FAIRFIELD  
and RAHIM HASSANALLY,

Defendants.

**Case No. 2:13-CV-00802-JAM-EFB**

**STIPULATION AND ORDER TO  
VACATE THE JUDGMENT AND  
DISMISS THIS ACTION WITH  
PREJUDICE**

Plaintiff, Volkswagen of America, Inc. (“Plaintiff”) and Defendants Maverick Auto Group 2, LLC dba Volkswagen of Fairfield and Rahim Hassanally (collectively “Defendants”) (Volkswagen and Defendants referred to collectively as the “Parties”) hereby submit the following stipulation to vacate the judgment and dismiss the above-captioned matter with prejudice.

**WHEREAS**, Plaintiff filed a Complaint in the United States District Court for the Eastern District of California – Sacramento Division, alleging causes of action for Breach of Contract and Breach of Guarantee (“Complaint”) against Defendants on or about April 24, 2013;

00027309.1

**STIPULATION AND [PROPOSED] ORDER TO VACATE THE JUDGMENT  
AND DISMISS THIS ACTION WITH PREJUDICE**

1       **WHEREAS** this Court granted Plaintiff's Motion for Summary Judgment and  
2 entered judgment against the Defendants on or about December 11, 2014  
3 ("Judgment"); and,

4       **WHEREAS** the Parties subsequently reached an agreement regarding the  
5 dispute that is the subject of the Complaint and Judgment, thereby resolving this action  
6 and related disputes entirely.

7       **THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the  
8 Parties that the Judgment be vacated and that the above-captioned action is dismissed  
9 with prejudice. *See*, Fed. R. Civ. P. Rules 41 and 60.

10  
11 DATED: March 6, 2015

THE SCALI LAW FIRM  
BY: /s/ Christian J. Scali, Esq.  
Christian J. Scali, Esq.  
Attorney for Defendants,  
**MAVERICK AUTO GROUP 2, LLC, dba**  
**VOLKSWAGEN OF FAIRFIELD and**  
**RAHIM HASSANALLY**

12  
13  
14  
15  
16 DATED: March 6, 2015

NELSON MULLINS RILEY &  
SCARBOROUGH, LLP

BY: S/Paul T. Collins  
Paul T. Collins, Esq.  
Attorney for Plaintiff,  
**VOLKSWAGEN OF AMERICA, INC.**

1  
2 **ORDER**

3 IT IS HEREBY ORDERED, that the Judgment entered on or about December  
4 11, 2014 is vacated and that the Complaint and any and all claims for relief in the  
5 above-captioned matter, U.S.D.C. E.D.Cal. Case No. 2:13-cv-00802-JAM-EFB, are  
6 hereby dismissed with prejudice.

7 **IT IS SO ORDERED.**

8  
9 DATED: 3/9/2015

/s/ John A. Mendez

HON JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE